

SEEGERWEISS LLP

August 25, 2022

By ECF

Honorable Anita B. Brody
United States District Court
Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Room 7613
Philadelphia, PA 19106

In re NFL Players' Concussion Injury Litigation, No. 2:12-md-02323-AB

Dear Judge Brody:

Class Counsel respectfully requests a 30-day extension of time to respond to the Motion for Relief Under Article XXVII of the Settlement Agreement (the "Motion," ECF No. 11813) filed by Settlement Class Members Troy Davis, Lynn James, Marvin Owens, Booker T. Brown, and Newton Williams. Counsel for the National Football League and NFL Properties LLC (the "NFL Parties") and counsel for Movants have both consented to this request.

Pursuant to Local Rule 7.1, Class Counsel's response is currently due on August 30, 2022; if this request is granted, the new deadline would be September 29, 2022. The request is made in light of work commitments.

A proposed order is attached.

Respectfully submitted,

/s/ Christopher A. Seeger
Christopher A. Seeger

Enclosure

cc: All counsel of record (via ECF)

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CERTIFICATE OF CONFERENCE

On August 25, 2022, Class Counsel contacted counsel for the NFL Parties and Jason Luckasevic of Goldberg, Persky & White, P.C., counsel for the movants, to seek their position on Class Counsel's requested 30-day extension of time to file a response to the Motion. Counsel for the NFL Parties and Mr. Luckasevic informed Class Counsel that they do not oppose the extension request.

Date: August 25, 2022

/s/ Christopher A. Seeger
Christopher A. Seeger

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing document was served electronically via the Court's electronic filing system on the 25th day of August, 2022, upon all counsel of record.

Date: August 25, 2022

/s/ Christopher A. Seeger
Christopher A. Seeger

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
successor-in-interest to
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:
ALL ACTIONS

[PROPOSED] ORDER

WHEREAS, Settlement Class Members Troy Davis, Lynn James, Marvin Owens, Booker T. Brown, and Newton Williams, by and through their counsel Goldberg, Persky & White, P.C., filed a Motion for Relief Under Article XXVII of the Settlement Agreement in the above-captioned matter on August 16, 2022 (the “Motion,” ECF No. 11813);

WHEREAS, Class Counsel has requested a 30-day extension of time, until September 29, 2022, to respond to the Motion;

No. 2:12-md-02323-AB
MDL No. 2323

Hon. Anita B. Brody

Civ. Action No. 14-00029-AB

It is **ORDERED** that the request for an extension of time is **GRANTED**.

SO ORDERED this ____ day of _____, 2022.

Anita B. Brody
United States District Court Judge